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October 18, 2006

Honorable James H. Welsh Commissioner of Conservation Office of Conservation P. O. Box 94275 Baton Rouge, LA 70804-4275

Re: Sparta Sand, Reservoir A

Sparta Zone, Reservoir A

Krotz Springs Field

St. Landry Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **TRIUMPH ENERGY**, **INC.** for the calling of a public hearing after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters:

- 1. To dissolve the Sparta Sand, Reservoir A, in the Krotz Springs Field, St. Landry Parish, Louisiana, previously established by Office of Conservation Order No. 163-Q, effective June 18, 1986, and simultaneously therewith, to create revised units and one (1) additional unit for the Sparta Zone, Reservoir A, in the Krotz Springs Field, St. Landry Parish, Louisiana, said units to be designated SP RA SUA, SP RA SUB and SP RA SUC, as shown on the plat attached hereto and made a part hereof.
- 2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the each of proposed units with each tract sharing in unit production on a surface acreage basis of participation.
  - 3. To designate Triumph Energy, Inc as operator of the proposed SP RA SUC.
- 4. To designate its Two O'Clock Bayou Land Corp. No. 1 Well as unit well for the proposed SP RA SUC at the location shown on the plat attached hereto.
- 5. Except to the extent herein set forth, to confirm and continue in full force and effect the provisions of Office of Conservation Order No. 163-Q and applicable statewide orders.

## 6. To consider such other matters as may be pertinent.

The Sparta Sand, Reservoir A, in the Krotz Springs Field, St. Landry Parish, Louisiana, was previously defined in Office of Conservation Order No. 163-Q, effective June 18, 1986.

The Sparta Zone, Reservoir A, in the Krotz Springs Field, is hereby defined as that gas and condensate bearing zone encountered between the depths of 12,254 feet and 12,585 feet (electric log measurements) (11,430 feet and 11,756 feet TVD) in the Triumph Energy, Inc. - Two O'Clock Bayou Land Corp. No. 1 Well, with a surface location in Section 14 and a bottomhole location in Section 13, of Township 6 South, Range 6 East, St. Landry Parish, Louisiana, and is further defined as that gas and condensate bearing zone encountered between the depths of 11,273 feet and 11,600 feet (electrical log measurements) in the Samson Contour Energy E&P, L.L.C. (formerly Sun Oil Company) – Two O'Clock Bayou Land Corp. No. 1 Well, located in Section 23, Township 6 South, Range 6 East, St. Landry Parish, Louisiana.

Pursuant to the Rules of Procedure, a pre-application conference was held on October 13, 2006, in Lafayette, Louisiana, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the applicant's proposals. Several questions were asked and answered. Representatives of ETOCO, L.P. expressed opposition to the proposed zone definition due in part to ETOCO's desire to have the existing Sand Unit A terminated. Differences between the parties could not be resolved. The conference was then adjourned. Opposition at the hearing is possible.

Pertinent data, including well logs, may be obtained **AT THE COST OF THE REQUESTING PARTY** from David Comeaux of Leon Comeaux & Associates, Post Office Box 53922, Lafayette, Louisiana 70505, Telephone Number 337/233-9839.

Attached hereto and made a part hereof is a plat showing the applicant's proposal, the conference attendance list and the list of the names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom a copy of this application is being furnished. Pursuant to the Revised Rules of Procedure, such plat (being the same plat attached to the preapplication notice dated September 22, 2006) and list of parties are being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. The plat and/or list of parties will be provided to any party requesting copies. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.



Finally, enclosed is our check in the amount of \$1,510.00 made payable to the Office of Conservation submitted on behalf of the applicant representing the hearing application fee.

Very truly yours,

LISKOW & LEWIS

Richard W. Revels, Jr.

RWRjr/df

**Enclosures** 

cc: Mr. Richard Hudson, Lafayette District of Office of Conservation

cc: Interested Owners, Represented Parties and Interested Parties

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